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10 *Pictures*

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13

14 ARTHUR LEE ALFRED, II et al.,

15 Plaintiffs,

16 v.

17 WALT DISNEY PICTURES,

18 Defendant,  
19

Case No. 2:18-CV-08074-CBM-ASx

**DECLARATION OF SETH  
WEINGER IN SUPPORT OF  
DEFENDANT WALT DISNEY  
PICTURES' *EX PARTE*  
APPLICATION TO EXTEND TIME  
FOR, AND PROVIDE GUIDANCE  
REGARDING, PLAINTIFFS' FACT  
DEPOSITIONS**

Judge: Hon. Consuelo B. Marshall  
Ctm.: First Street Courthouse 8D

Filed Concurrently: Ex Parte  
Application and Memorandum of Points  
and Authorities; Declaration of Jordan  
D. Segall: [Proposed] Order

**DECLARATION OF SETH WEINGER**

I, Seth Weinger, declare as follows:

1. I am Senior Vice President, Content Finance at Defendant Walt Disney Pictures (“WDP”). I make this declaration based on personal knowledge. If called as a witness, I could and would testify competently to the facts stated herein.

2. In early June 2022, I learned that WDP intended to designate me as a corporate representative to testify about certain topics regarding finance and accounting issues that Plaintiffs set forth in a 30(b)(6) deposition notice to WDP.

3. Motion picture accounting is technical and detailed. It involves, among other things, accounting for revenue streams from around the world, complicated production and distribution costs, and direct and contingent compensation paid to individuals related to their work on motion pictures. There are a limited number of employees at WDP who are qualified to offer competent testimony on the technical financial topics that Plaintiffs noticed for 30(b)(6) testimony. I am not aware of anyone at WDP who would be able to obtain the factual information necessary to testify on these topics more readily and efficiently than I would be able to do.

4. At the time I was designated by WDP as a 30(b)(6) witness, I had preexisting work commitments that severely limited my time to prepare and sit for a deposition before June 29, 2022.

5. Most significantly, The Walt Disney Company’s meeting of the Board of Directors has long been scheduled to take place at the end of this month. Part of my job duties include preparing financial information and analysis for these board meetings. My involvement in preparing for this meeting will be largely complete by June 27. As a result, I would be able to complete preparations for my deposition on June 28, and to appear and testify at deposition on June 29.

6. If necessary to accommodate Plaintiffs’ schedules, I am also available for a deposition in early July.

1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct.

3 Executed on this 23rd day of June, 2022, at Los Angeles, California.  
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5 *Seth Weinger*

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